

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

JOHN DOE

V.

JOHNSON & WALES UNIVERSITY

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Case No. 18-106-JJM-LDA

**DEFENDANT’S REPLY IN SUPPORT OF ITS MOTION TO COMPEL
PLAINTIFF’S RESPONSE TO DEFENDANT’S INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant Johnson & Wales University (“JWU”) responds briefly to Plaintiff’s objection to JWU’s motion to compel.

Plaintiff notes that JWU has given Plaintiff several extensions to respond to JWU’s document requests and interrogatories propounded in early June, which extensions passed without compliance. After JWU filed its motion to compel, counsel conferred regarding the outstanding discovery and agreed to schedule Plaintiff’s deposition to occur on November 1, 2018.

To allow JWU sufficient time to review the discovery responses and prepare for Plaintiff’s deposition, JWU requests that the Court enter an order requiring Plaintiff’s production of his past due responses by Friday, October 5, 2018. JWU’s motion to compel should be granted, not denied as suggested by Plaintiff.

/s/ Steven M. Richard

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Dated: September 24, 2018

Attorneys for *Defendant Johnson & Wales University*

CERTIFICATE OF SERVICE

I certify that, on the 24th day of September, 2018, I served this Reply upon Plaintiff's counsel by electronic mail through the Court's EM/ECF system.

/s/ Steven M. Richard